

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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DIONNE LEE

Plaintiff

RICHARD K. BAWUAH and
COWAN EQUIPMENT LEASING

Civil Action No. 07-cv-9917

**CERTIFICATION OF
COUNSEL**

Defendants

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1. Jeffrey A. Segal, Esquire, an attorney duly admitted to practice law before the applicable Courts of the State of New York, hereby affirms the truth of the following, under the penalties of perjury:

2. I, Jeffrey A. Segal, am a partner of Rawle & Henderson LLP, attorneys for the defendants, Richard K. Bawuah and Cowan Equipment Leasing, and as such I am fully familiar with the facts and circumstances herein.

3. Plaintiff filed suit in this matter on or about November 9, 2007 in the United States District Court for The Southern District of New York.

4. Defendants filed an Answer with Affirmative Defenses with the United States District Court for The Southern District of New York, on or about December 14, 2007.

5. This action arises out of a motor vehicle accident that occurred on the eastbound, Upper Level of the George Washington Bridge at 12:40 a.m. on Monday, May 9, 2007.

6. As a result of the accident, plaintiff is asserting a past and future wage loss claim. Specifically, in her deposition, she alleges that she has not been able to return to

her pre-accident employment since the accident and continuing into the future. (see, plaintiff's deposition transcript at page 25, attached hereto as Exhibit "A").

7. Although plaintiff did not include a allegations within her Civil Action Petition specifically alleging lost earnings, she provided an Affidavit in Support thereof alleging "since the date of said injury, I have been unable to work and unable to perform many of my normal daily activities". (see, plaintiff's Civil Action Petition and Affidavit in Support, attached hereto as Exhibit "B").

8. However, plaintiff has not affirmatively supplied a medical expert report, vocational expert report or economist report to support her lost wage claim. The deadline for the service of all expert reports was June 15, 2008.

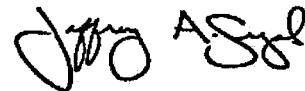
9. Further, at the June 10, 2008 status conference before Your Honor, plaintiff's counsel represented to the Court that he did not require any extensions of the expert deadlines.

10. Therefore, defendants request that plaintiff be barred from introducing any evidence regarding her alleged wage loss claim at trial.

WHEREFORE, Defendants, Richard K. Bawuah and Cowen Equipment Leasing, request this Honorable Court to preclude plaintiff from using, referring to, or introducing

any wage loss claims, as well as any testimony regarding same, at trial.

RAWLE & HENDERSON LLP



By: _____

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Dated: July 3, 2008